

RUBINSTEIN & COROZZO, LLP

COUNSELORS AT LAW

260 MADISON AVENUE, 22ND FLOOR
NEW YORK, N.Y. 10016
TELEPHONE (212) 545-8777; FAX (917) 722-8206
INFO@RUBCORLAW.COM

RONALD RUBINSTEIN
JOSEPH R. COROZZO

ANGELA D. LIPSMAN (NY; NJ)

Of Counsel:
MARSHALL A. MINTZ

June 6, 2022

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: United States v. Franzone
21 CR 446 (VSB)

Dear Judge Broderick,

We represent Defendant Andrew Franzone ("Franzone") in the above-captioned case. We write to request permission for Mr. Franzone to travel to Florida later this week.

If granted, Pretrial Services will be provided with Mr. Franzone's travel itinerary. Mr. Franzone would travel to Florida on Thursday, June 9, 2022 and return to New York on Friday, June 10, 2022. The trip would allow him to participate with counsel in investigating and interviewing potential witnesses, meet with attorneys concerning proceedings in the United States Bankruptcy Court for the Southern District of Florida, and potentially view the court's file.

We have asked the Government if the U.S. Attorney's Office has any objection to this request, and have been advised that so long as Mr. Franzone complies with the terms of his bail (i.e. has counsel present during any witness interviews), the Government defers to Pretrial Services.


We have conferred with Pretrial Services. Pretrial Services has no objection to this application, just a reminder that Mr. Franzone must comply with the terms of his bond (i.e. if while in Florida, Mr. Franzone locates his passport or any firearms or weapons, they must be surrendered, and counsel has duly reminded Mr. Franzone of same).

To our knowledge, there have been no issues concerning Mr. Franzone's compliance with the terms of his pretrial release.

Wherefore, we respectfully request that Mr. Franzone be permitted to travel to Florida from Thursday, June 9, 2022 to Friday, June 10, 2022.

Thank you for your consideration.

Respectfully,



Joseph R. Corozzo, Esq.
Angela D. Lipsman, Esq.

cc: AUSA Kiersten Fletcher (via ECF)
Pretrial Services Officer Francesca Piperato (via email)